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WILLIAM D. JOYCE, III (WDJ9899)  
BARRY, McTIERNAN & MOORE  
2 Rector Street – 14<sup>th</sup> Floor  
New York, New York 10006  
(212) 313-3600

Attorneys for Defendants STRUCTURE TONE, INC. s/h/a STRUCTURE TONE  
(UK), INC. and STRUCTURE TONE GLOBAL SERVICES, INC.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE LOWER MANHATTAN DISASTER SITE  
LITIGATION

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WILLIAM NOESGES AND DENISE NOESGES,

Plaintiffs,

-against-

**NOTICE OF  
ADOPTION**

**06 CV 14925**

ON-SITE:

7 WORLD TRADE COMPANY, L.P., A RUSSO  
WRECKING, INC., ABM INDUSTRIES, INC., ABM  
JANITORIAL NORTHEAST, INC., AMEC  
CONSTRUCTION MANAGEMENT, INC., AMEC  
EARTH & ENVIRONMENTAL INC., ANTHONY  
CORTESE SPECIALIZED HAULING LLC, ATLANTIC  
HEYDT CORP., BECHTEL ASSOCIATES  
PROFESSIONAL CORPORATION, BECHTEL  
CONSTRUCTION, INC., BECHTEL CORPORATION,  
BECHTEL ENVIRONMENTAL, INC., BERKEL &  
COMPANY, CONTRACTORS, INC., BIG APPLE  
WRECKING & CONSTRUCTION CORP., BOVIS LEND  
LEASE LMB, INC., BREEZE CARTING CORP.,  
BREEZE NATIONAL INC., BRER-FOUR  
TRANSPORTATION CORP., BURO HAPPOLD  
CONSULTING ENGINEERS, P.C., C.B.  
CONTRACTING CORP., CANRON CONSTRUCTION  
CORP., CORD CONTRACTING CO., INC., DAKOTA  
DEMO-TECH, DIAMOND POINT EXCAVATING  
CORP., DIEGO CONSTRUCTION, INC., DIVERSIFIED  
CARTING, INC., DMT ENTERPRISE, INC.,  
D'ONOFRIO GENERAL CONTRACTORS CORP.,  
EAGLE LEASING & INDUSTRIAL SUPPLY, INC.,

EAGLE ONE ROOFING CONTRACTORS INC., EJ  
DAVIES, INC., EN-TECH CORP., EVERGREEN  
RECYCLING OF CORONA (EROC), EWELL W.  
FINLEY, P.C., EXECUTIVE MEDICAL SERVICES,  
P.C., FLEET TRUCKING, INC., FRANCIS A. LEE  
EXTERIOR RESTORATION, INC., FTI TRUCKING,  
INC., GILSANZ, MURRAY & STEFICEK, LLP,  
GOLDSTEIN ASSOCIATES CONSULTING  
ENGINEERS, PLLC, HALLEN WELDING SERVICE,  
INC., H.P. ENVIRONMENTAL, KOCH SKANSKA INC.,  
LAQUILA CONSTRUCTION INC., LASTRADA  
GENERAL CONTRACTING CORP., LESLIE E.  
ROBERTSON ASSOCIATES CONSULTING  
ENGINEERS P.C., LIBERTY MUTUAL GROUP,  
LOCKWOOD, KESSLER & BARTLETT, INC., LUCIUS  
PITKIN, INC., LZA TECH-DIV OF THORTON  
TOMASETTI, MANAFORT BROTHERS  
INCORPORATED, MAZZOCCHI WRECKING, INC.,  
HUDSON MERIDIAN CONSTRUCTION GROUP, LLC  
F/K/A MERIDIAN CONSTRUCTION CORP.,  
MORETRENCH AMERICAN CORP., MRA  
ENGINEERING, PC, MUESER RUTLEDGE  
CONSULTING ENGINEERS, INC., NACIREMA  
INDUSTRIES INCORPORATED, NEW YORK CRANE  
& EQUIPMENT CORP., NICHOLSON  
CONSTRUCTION COMPANY, PETER SCALA  
MANDRE & SONS, INC., PINNACLE  
ENVIRONMENTAL CORP., PLAZA CONSTRUCTION  
CORP., PORT AUTHORITY OF NEW YORK AND  
NEW JERSEY, PRO SAFETY SERVICES LLC., PT&L  
CONTRACTING CORP., ROBER SILMAN  
ASSOCIATES, ROBERT L. GEROSA, INC., RODAR  
ENTERPRISES, INC., ROYAL GM, INC, SAB  
TRUCKING INC., SAFEWAY ENVIRONMENTAL  
CORP., SEASONS INDUSTRIAL CONTRACTING,  
SEMCOR EQUIPMENT & MANUFACTURING CORP.,  
SILVERITE CONTRACTING CORPORATION,  
SIMPSON GUMPERTZ & HEGER INC., SKIDMORE,  
OWING & MERRILL LLP, SURVIVAIR, TISHMAN  
CONSTRUCTION CORPORATION OF MANHATTAN,  
TISHMAN CONSTRUCTION CORPORATION OF NEW  
YORK, TISHMAN INTERIORS CORPORATION,  
TISHMAN SPEYER PROPERTIES, THORTON-  
TOMASETTI GROUP, INC., TORRETTA TRUCKING,  
INC., TOTAL SAFETY CONSULTING, L.L.C., TUCCI  
EQUIPMENT RENTAL CORP., TULLY

CONSTRUCTION CO., INC., TURNER  
CONSTRUCTION COMPANY, ULTIMATE  
DEMOLITION/CS HAULING (JOINT VENTURE),  
VERIZON NEW YORK INC., VOLLMER ASSOCIATES  
LLP, WEEKS MARINE, INC., WEIDLINGER  
ASSOCIATES, CONSULTING ENGINEERS, P.C.,  
WHITNEY CONTRACTING INC., WOLKOW-BRAKER  
ROOFING CORP., WORLD TRADE CENTER  
PROPERTIES LLC, WSP CANTOR SEINUK,  
YANNUZZI & SONS, INC., YONKERS  
CONTRACTING COMPANY, INC., YORK HUNTER  
CONSTRUCTION, LLC, ZIEGENFUSS DRILLING,  
INC.,

OFF-SITE:

ALAN KASMAN DBA KASCO, ANN TAYLOR  
STORES CORPORATION, BATTERY PARK CITY  
AUTHORITY, BFP ONE LIBERTY PLAZA CO., LLC,  
BLACKMON-MOORING-STEAMATIC CATASTOPHE,  
INC. D/B/A BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, LP, BROOKFIELD PARTNERS, LP,  
BROOKFIELD PROPERTIES CORPORATION,  
BROOKFIELD PROPERTIES HOLDINGS INC,  
ENVIROTECH CLEAN AIR, INC., GPS  
ENVIRONMENTAL CONSULTANTS, INC., HILLMAN  
ENVIRONMENTAL GROUP, LLC, INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC., KASCO  
RESTORATION SERVICES CO., MERRILL LYNCH &  
CO, INC., NATIONAL ASSOCIATION OF SECURITIES  
DEALERS, INC., NEW LIBERTY PLAZA LP, NEW  
YORK CITY ECONOMIC DEVELOPMENT  
CORPORATION, NEW YORK CITY INDUSTRIAL  
DEVELOPMENT AGENCY, NEW YORK CITY  
INDUSTRIAL DEVELOPMENT CORPORATION,  
NOMURA HOLDING AMERICA, INC., NOMURA  
SECURITIES INTERNATIONAL, INC., ONE LIBERTY  
PLAZA, STRUCTURE TONE (UK), INC., STRUCTURE  
TONE GLOBAL SERVICES, INC., THE BOARD OF  
MANAGERS OF THE ONE LIBERTY PLAZA  
CONDOMINIUM (CONDO #1178), THE ONE LIBERTY  
PLAZA CONDOMINIUM (CONDO #1178), TOSCORP  
INC., TUCKER ANTHONY, INC., WESTON  
SOLUTIONS, INC., WFP ONE LIBERTY PLAZA CO.,  
LP., WFP ONE LIBERTY PLAZA, CO. GP, CORP., WFP  
TOWER A CO., WFP TOWER A CO. G.P. CORP. WFP  
TOWER A. CO., L.P., WFP TOWER B CO. G.P. CORP.,



WFP TOWER B HOLDING CO., LP, WFP TOWER B  
CO., L.P. AND WORLD FINANCIAL PROPERTIES,  
L.P., ET AL,

Defendants.

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PLEASE TAKE NOTICE that defendants, STRUCTURE TONE, INC. s/h/a  
STRUCTURE TONE (UK), INC. and STRUCTURE TONE GLOBAL SERVICES,  
INC. (hereinafter "STRUCTURE TONE"), as and for their responses to the allegations  
set forth in the Complaint by Adoption (Check-Off Complaint) related to the Master  
Complaint filed in the above-referenced action, hereby adopts STRUCTURE TONE's  
Answer to the Master Complaint dated July 30, 2007, which was filed in the matter of *In  
Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

To the extent that STRUCTURE TONE's Answer to the Master Complaint does  
not comprehensively address any of the specific allegations within the Check-Off  
Complaint in the above-captioned matter, STRUCTURE TONE denies knowledge or  
information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, STRUCTURE TONE, INC. s/h/a STRUCTURE TONE (UK),  
INC. and STRUCTURE TONE GLOBAL SERVICES, INC., demands judgment  
dismissing the above-captioned action as against it, together with its costs and  
disbursements.

Dated: New York, New York  
September 12, 2007

A handwritten signature in dark ink, appearing to read "William D. Joyce, III", is written over a horizontal line.

WILLIAM D. JOYCE, III (WDJ 9899)  
BARRY, McTIERNAN & MOORE  
Attorneys for Defendants  
STRUCTURE TONE, INC. s/h/a  
STRUCTURE TONE (UK), INC. and  
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